From: joseph.shacat@gmail.com
To: Ruelas, Cynthia
Cc: Armann, Steve
Subject: Re: Makakilo Site follow-up
Date: Wednesday, November 26, 2014 4:38:05 PM

Cynthia, thanks for the email. It really helps to clarify everything we have been discussing in writing.

The only comment that I have at this time is that we did not sample the sidewalls of the excavation. Instead, the lateral extent of the contamination was determined based on a combination of surface sampling (along the edges of the area of concern), and confirmation sampling that occurred during the initial rounds of cleanup and soil removal/remediation. This will be explained in detail with the release response assessment report that our consultant (ESI) is preparing.

aloha,
Joseph

Joseph Shacat
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On Wed, Nov 26, 2014 at 12:31 PM, Ruelas, Cynthia <RUELAS.CYNTHIA@epa.gov> wrote:

> Hello Joseph,
>
> Thank you for providing me with updates on the cleanup effort taking place at the Makakilo Quarry site. I wanted to address some of the questions you posed regarding additional excavation requirements; disposal of excavated material (if Grace Pacific moves forward with additional removal efforts); and use of clean backfill at the site.
>
> As part of the cleanup effort, PCB-contaminated soil was excavated within the area of concern at the site, and verification samples were collected at the bottom and sidewalls of the excavation. Two sets of verification samples were collected; multi-incremental (MI) sampling was conducted per HDOH's direction and discrete sampling was conducted per USEPA's direction. The cleanup goal established by HDOH is 1.1 ppm for total PCBs by weight. PCB cleanup conducted under USEPA's direction was in accordance with requirements set forth in Subpart G, Spill Cleanup Policy, of the PCB regulations. The Spill

Cleanup Policy indicates that soil contaminated by a high-concentration spill in non-restricted access areas shall be decontaminated to 10 ppm PCBs by weight. Furthermore, the excavated soil is to be replaced with clean soil, containing less than 1 ppm PCBs, and the spill area shall be restored (e.g., replacement of turf).

Grace Pacific's initial excavation was conducted shortly after the PCB release occurred. The second round of excavation within the area of concern was conducted in accordance with the PCB Release Response Assessment and Remediation Workplan (Revised) dated April 17, 2014 (Revised Workplan). Verification samples were collected in accordance with the Revised Workplan. Analytical results indicated that MI sampling results were below the 1.1 ppm threshold for total PCBs established by HDOH as the cleanup goal. However discrete verification sampling within the area of concern indicated that the highest concentration detected at the site was 1.2 ppm total PCBs by weight. The 1.2 ppm results are well below the 10 ppm threshold established for Grace Pacific's site specific scenario. In accordance with in the Spill Cleanup Policy, Grace Pacific plans to backfill the existing excavation with clean fill (<1 ppm PCBs) and not conduct any additional excavation.

Based on the current data, USEPA is not requiring additional excavation of the areas where the 1.2 ppm total PCBs was detected. If HDOH requires that additional excavation be conducted, or if Grace Pacific decides that they would like to conduct subsequent excavation in the areas where the 1.2 ppm PCB hits were detected, this work would not be required per the Spill Cleanup Policy, and therefore, disposal of any additional excavated soil would not be overseen by USEPA. Grace Pacific would have to work directly with appropriate disposal facilities to determine where the soil can be accepted and ultimately disposed of.

Furthermore, given that USEPA's residential regional screening level (RSL) for Aroclor 1016 is 3 ppm, USEPA considers the remaining 1.2 ppm total PCBs by weight to be protective for residential use.

Grace Pacific is looking into using/regrading soil in the surrounding area to backfill the excavated area. This soil has been previously characterized for PCBs as well as other chemicals of concern, consistent with the HODH guidance on characterizing import fill. This soil may be used as backfill as long as characterization data demonstrates that it is below the 1 ppm threshold for clean fill established in the Spill Cleanup Policy.

Consistent with the above, USEPA concludes that no further cleanup of PCBs is necessary at the Grace Pacific Makakilo site within the area of concern. However, USEPA may require additional investigation and cleanup of PCBs if (1) a finding is made after the date of this letter that PCBs remain within the area of concern or other areas within the site at concentrations that are not protective. The site encompasses approximately 54-acre area, of which approximately 7,200 square feet were the subject of investigations and remediation

(as deemed necessary) under TSCA.

Thanks,

Cynthia

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Cynthia Ruelas

Environmental Engineer

Permits Section

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